

United States District Court
Eastern District of Michigan
Southern Division

United States of America,

Criminal Case No: 19-cr-20026

Plaintiff,

Hon. Gershwin A. Drain

v.

D-1 Bharath Kakireddy,
D-2 Suresh Reddy Kandala,
D-3 Phanideep Karnati,
D-4 Prem Kumar Rampeesha,
D-5 Santosh Reddy Sama,
D-6 Avinash Thakkallapally,

Defendants.

Second Forfeiture Bill of Particulars

The United States of America, by and through its counsel, submits this Second Forfeiture Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement the criminal forfeiture allegations included in the Indictment and Forfeiture Bill of Particulars, and to list specific property that the United States intends to forfeit upon Defendants' conviction. (Dkt. Nos. 1, 70.)

This Second Forfeiture Bill of Particulars incorporates by reference, in its entirety, the Indictment, specifically the Forfeiture Allegation, as well as the

property set forth in the Forfeiture Bill of Particulars (Dkt. No. 70). Additional property subject to forfeiture, pursuant to 18 U.S.C. § 982(a)(6) and/or 18 U.S.C. § 981(a)(1)(C), together with 28 U.S.C. § 2461(c), includes, but is not limited to:

The following real property, **10808 Symington Circle, Louisville, KY 40241**, more fully described as:

Being all of Lot 54, Worthington Place Subdivision, Section 1, of record in Plat and Subdivision Book 48, Pages 77 and 78, in the Jefferson County Clerk's Office.

Being the same property conveyed to Phanideep Karnati and Ramya Karnati, husband and wife, by deed dated July 29, 2016, of record in Deed Book 10684, Page 961, in the Jefferson County Clerk's Office.

APN # 21-3515-0054-0000

Upon being convicted of violating 18 U.S.C. § 371 as charged in Count One of the Indictment, Defendant Avinash Thakkallapally shall forfeit to the United States any property which constitutes, or is derived from, proceeds obtained directly or indirectly as a result of such violations, pursuant to 18 U.S.C. § 982(a)(6) and/or 18 U.S.C. § 981(a)(1)(C), together with 28 U.S.C. § 2461, including a forfeiture money judgment in the amount of \$12,166.43 against Defendant Avinash Thakkallapally in favor of the United States, representing the total amount of proceeds obtained as a result of such violations.

Upon being convicted of violating 18 U.S.C. § 371 as charged in Count One of the Indictment, Defendant Santosh Reddy Sama shall forfeit to the United States

any property which constitutes, or is derived from, proceeds obtained directly or indirectly as a result of such violations, pursuant to 18 U.S.C. § 982(a)(6) and/or 18 U.S.C. § 981(a)(1)(C), together with 28 U.S.C. § 2461, including a forfeiture money judgment in the amount of \$57,651.41 against Defendant Santosh Reddy Sama in favor of the United States, representing the total amount of proceeds obtained as a result of such violations.

This notice does not limit the Government from seeking the forfeiture of additional specific property, including substitute assets, or limit the Government from seeking the imposition of additional forfeiture money judgments.

Respectfully submitted,

Matthew Schneider
United States Attorney

S/Michael El-Zein

Michael El-Zein (P79182)

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Dated: May 7, 2019

Certificate of Service

I hereby certify that on May 7, 2019, the foregoing document was electronically filed with the Clerk of the Court using the ECF system which will send notification to all ECF participants.

S/Michael El-Zein

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